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February 14, 2023

Honorable Judge John P. Mastando III  
U.S. Bankruptcy Judge  
Southern District of New York  
One Bowling Green  
New York, NY 10004-1408

**Re: *In re: MICHAEL DAVID GREENFIELD a.k.a. MICHAEL BEN-ARI (Case No. 21-11411) (SCC)***

Dear Judge Mastando,

I write on behalf of the Foreign Representative in the above-captioned matter concerning the relief sought in the Motion to Confirm the Foreign Representative's Authority to Repatriate Assets to Israel (Dkt. 21) (the "Motion").

In the Motion, the Foreign Representative sought to affirm his authority to realize, take control of, and repatriate to Israel: (1) all Non-Reserved Assets, identified and held in an escrow account controlled by Seiden Law Group LLP, counsel of record for the Foreign Representative, and all Non-Reserved and currently unidentified assets, which upon investigation, the Foreign Representative may locate and identify in the future; and (2) all Reserved Assets, identified and unidentified, conditional upon the agreement of the U.S. Department of Justice ("DOJ"). Pursuant to a request by the DOJ, on May 9, 2022, the Foreign Representative without prejudice withdrew specific relief requested in the Motion as to all Reserved Assets. However, the Foreign Representative maintained his request for relief in the Motion affirming his authority to realize, take control of, and repatriate to Israel the Non-Reserved Assets. On May 10, 2022, the Court issued an Order reflecting this modification and entrusted the Foreign Representative with the exclusive authority to administer, realize, and distribute the Debtor's Non-Reserved Assets pursuant to 11 U.S.C. §§ 1521(a)(5) and 1521(b) and specifically repatriate the Non-Reserved Assets to Israel. (Dkt. 28).

On February 6, 2023, at the request of the government of Israel, the DOJ sought and obtained an Order from the U.S. District Court for the District of Columbia. This Order lifted an August 31, 2022 Restraining Order, and February 14, 2022 Order, modifying that Restraining Order, under which the Reserved Assets were restrained (1:22-MC-00014). Accordingly, the U.S. District Court for the District of Columbia has now released all U.S. assets covered by the Order, including Reserved Assets.



In light of the foregoing, the Foreign Representative respectfully seeks a Court order confirming his authority to administer, realize, and distribute the Reserved Assets pursuant to 11 U.S.C. §§ 1521(a)(5) and 1521(b) and specifically repatriate them to Israel. The DOJ and the Office of the U.S. Trustee have no objection to this request.

Very truly yours,

/s/ Dov Gold  
Dov Gold

CC: William I. Friedman  
Trial Attorney, International Unit  
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